



SEP 04 2000

August 30, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: Ultra-Wideband  
ET Docket 98-153

Dear Ms. Salas:

This letter is in response to the FCC's Notice of Proposed Rulemaking on ultra-wideband radio. I am writing on behalf of our organization and industry — Thoroughbred horseracing and breeding — which involve some 472,000 full-time jobs with a total annual economic impact of \$34 billion.

Our industry is challenged by significant new and growing competition for the entertainment dollar. Our costs are higher than most of our competitors due to the labor-intensive nature of our business, which in reality is a large American agribusiness. Unless like other industries we can lower our costs through innovation and technology, our future viability and growth are in serious question.

Currently, our industry spends millions of dollars each year in tracking the performance (speed, location, etc.) of our equine athletes, both in actual competition and in training. We have been looking for a technology to streamline and automate this process for over a decade. We believe that the use of miniaturized computer chip sets, with precise tracking capability via UWB radio, represents the best solution we have seen to date.

As we operate in a limited number of confined venues, we are confident that we could operate without interfering with military or other uses. We could certainly agree to pilot programs to test these assumptions.

In any event, we would urge the commission to move forward swiftly with its deliberations in this area. If we will (or will not) have the opportunity to test and hopefully use this preferred technology, then we need to know so as soon as possible.

Thank you for the opportunity to endorse FCC rulemaking on ultra-wideband radio technology. In our particular industry, we feel strongly that UWB's unique, low-cost, low-power tracking capabilities can be used to produce badly needed efficiency gains. We hope that UWB will be allowed to proceed on a timely basis.

Sincerely,

*Tim Smith* No. of Copies rec'd \_\_\_\_\_  
List A B C D E

Timothy G. Smith  
Commissioner and CEO

**NATIONAL THOROUGHBRED RACING ASSOCIATION**

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